

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF)	
VENEZUELA,)	
)	
Defendant.)	

SPECIAL MASTER’S JOINT STATUS REPORT

Robert B. Pincus, in his capacity as Special Master for the United States District Court for the District of Delaware in the above-captioned case (the “**Special Master**”),¹ submits this joint status report (the “**Joint Status Report**”) pursuant to the Court’s instructions at the Sale Hearing on September 18, 2025. The Special Master, after conferring with the Sale Process Parties and other interested parties, sets forth the proposed briefing schedule below, which is consistent with the Court’s inclinations filed on September 23, 2025 (D.I. 2333) and the Court’s previous practice, *see, e.g., United States of America v. Sabre Corporation et al*, C.A. No. 19-1548-LPS (D. Del.).² In proposing the schedule below, the Special Master is focused on ensuring the Court has sufficient time to review the submissions and issue a ruling in advance of the December 1, 2025 deadline for

¹ All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the “**Sale Procedures Order**”) or the Updated Final Recommendation (D.I. 2123).

² Gold Reserve and the Venezuela Parties have informed the Special Master that they intend to submit, by a separate letter, an alternative proposal and requests as to the timing and form of proceedings that, in certain respects, differs substantially from the Court’s September 23 inclinations and the Special Master’s proposal set forth herein. Accordingly, references to “parties” throughout this report, do not include Gold Reserve or the Venezuela Parties.

the Recommended Bidder to obtain court approval under its TSA with the 2020 Bondholders.

The parties believe that oral argument addressing the Special Master’s Updated Final Recommendation can be completed in a single day, and prefer Tuesday, October 21, 2025, if that date still works for the Court. With respect to Post-Trial briefing, the parties are comfortable relying on the briefing to be submitted in advance of the hearing (two rounds of briefing per party) and their oral arguments, but to the extent the Court determines that a further round of briefing would be helpful after the hearing, the parties agree with the proposed October 28, 2025 deadline for submission of any such briefing. Per the Court’s direction, the parties will coordinate to limit the number of proposed findings of fact and briefs—whether in support of or in opposition to the Special Master’s Updated Final Recommendation—as much as possible.

As part of the joint status report due to the Court on September 26, 2025 (*see* D.I. 2332), the Special Master together with Gold Reserve and the Venezuela Parties will provide a separate proposed briefing schedule for any disqualification motion.

Event	Deadline
Simultaneous Submissions of Findings of Fact (no proposed page limit) ³	Wednesday, October 8, 2025, by 11:59 p.m. ET
Simultaneous Submissions of Post-Trial Briefs (30 page limit)	Wednesday, October 8, 2025, by 11:59 p.m. ET
Simultaneous Submissions of Post-Trial Answering Briefs (30 page limit)	Wednesday, October 15, 2025, by 11:59 p.m. ET
Simultaneous Submissions of Supplemental Facts only to the extent necessary to address Findings of Fact submitted by other Parties (no proposed page limit)	Wednesday, October 15, 2025, by 11:59 p.m. ET

³ The parties request that the Court consider only arguments set forth in the Post-Trial Briefs and ignore any arguments included in the Findings of Fact.

Event	Deadline
Oral Argument	Tuesday, October 21, 2025
If requested, Simultaneous Submissions of Post-Trial Reply Briefs (alternative proposals on page limit: 15 – 25 pages)	Tuesday, October 28, 2025, by 11:59 p.m. ET

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

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Dated: September 25, 2025
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By: /s/ Myron T. Steele

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